

Control Number: 51415

Item Number: 161

Addendum StartPage: 0

#### SOAH DOCKET NO. 473-21-0538 PUC DOCKET NO. 51415

ESTERN § BEFORE THE STATE OFFICE

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR

§ OF

AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

# SOUTHWESTERN ELECTRIC POWER COMPANY'S STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER

Certain documents provided in response to Texas Industrial Energy Consumer's (TIEC) Fourth Request for Information to Southwestern Electric Power Company (SWEPCO), Question Nos. 4-2, 4-5, and 4-12 are exempt from public disclosure pursuant to Section 552.110 of the Public Information Act<sup>1</sup> and are subject to treatment as Highly Sensitive materials.

The materials provided in response to TIEC's Question Nos. 4-2, 4-5, and 4-12 contain non-public commercial and financial forecast information related to capital metric calculations, detailed compilations of financial data related to capital expenditure projections, and historical and projected capital structure, expenditures, and funding, that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

Counsel for SWEPCO has reviewed the documents sufficiently to state in good faith that the documents are exempt from disclosure under the Public Information Act and merit the Highly Sensitive designation given to them.

ilpl

<sup>&</sup>lt;sup>1</sup> Tex. Gov. Code Ann. § 552.001-.353.

#### Respectfully submitted,

Melissa Gage

State Bar No. 24063949

Email: magage@aep.com

aepaustintx@aep.com (Service)

Leila Melhem

State Bar No. 24083492

Email: lmmelhem@aep.com

aepaustintx@aep.com (Service)

400 West 15th Street, Suite 1520

Austin, Texas 78701

Telephone: (512) 481-3320 Facsimile: (512) 481-4591

## AMERICAN ELECTRIC POWER SERVICE CORPORATION

William Coe

State Bar No. 00790477

Email: wcoe@dwmrlaw.com

Kerry McGrath

State Bar No. 13652200

Email: kmcgrath@dwmrlaw.com

Patrick Pearsall

State Bar No. 24047492

Email: ppearsall@dwmrlaw.com

Stephanie Green

State Bar No. 24089784

Email: sgreen@dwmrlaw.com

P.O. Box 1149

Austin, Texas 78767

Telephone: (512) 744-9300 Facsimile: (512) 744-9399

**DUGGINS WREN MANN & ROMERO, LLP** 

By: Hoyhame Green
Stephanie Green

ATTORNEYS FOR SOUTHWESTERN ELECTRIC POWER COMPANY

### **CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on January 22, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.

Hoghanie Green
Stephanie Green